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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION**

JAMES LIGON

Plaintiff,

v.

JOE LAFAUCI, INDIVIDUALLY
AND AS AN OFFICER OF THE
CALIFORNIA HIGHWAY PATROL

Defendant.

Case No.: CV 13-02875-RMW

**JOINT PROPOSED NEUTRAL
STATEMENT TO PROSPECTIVE
JURORS**

Date: January 15, 2015
Time: 2:00 p.m.
Courtroom: 6, 4th Floor
Judge: Hon. Ronald M. Whyte

**TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD
HEREIN:**

Plaintiff, James Ligon and Defendant Joseph Lafauci hereby submit the
following proposed neutral statement for the aid and convenience of the court:

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1 This case is about an officer involved shooting between Officer Joseph
 2 Lafauci and Plaintiff James Ligon. Plaintiff alleges that on June 21, 2012, Officer
 3 Lafauci violated his constitutional rights and was negligent when Officer Lafauci
 4 shot and seriously injured Plaintiff during an arrest. Defendant Joseph Lafauci
 5 denies plaintiff's claims and contends that his actions were reasonable under the
 6 circumstances.

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 9 DATED: January 2, 2015

MORALES & LEANOS

10 By: /s/ Jaime Leanos
 11 JAIME LEANOS
 12 Attorney for Plaintiff

13 DATED: January 2, 2015

14 LAW OFFICE OF NELSON
 15 McELMURRY

16 By: /s/ Nelson McElmurry
 17 NELSON MCELMURRY
 18 Attorney for Plaintiff

19 I affirm that Defendants' counsel has consented to the electronic filing of
 20 this document on Defendants behalf.

21
 22 DATED: January 2, 2015

23 ROHIT KODICAL, DEPUTY
 24 ATTORNEY GENERAL

25 By: /s/ Rohit Kodical
 26 ROHIT KODICAL
 27 Deputy Attorney General
 28 Attorney for Defendant